

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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In re: **RAHN LYNN MIHELICH,**  
Debtor.

Case No.: 2016-21724-GMH-13  
Chapter 13

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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Rahn Lynn Mihelich has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your Rights May be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court  
517 E. Wisconsin Avenue  
Room 126  
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

MILLER & MILLER LAW, LLC  
735 West Wisconsin Avenue  
Suite 600  
Milwaukee, Wisconsin 53233  
(414) 277-7742  
(414) 277-1303

You must also mail a copy to:

Attorney Krysta L. Kerr  
MILLER & MILLER LAW, LLC  
735 West Wisconsin Avenue  
Suite 600  
Milwaukee, Wisconsin 53233

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1. The Proponent of this modification is

**X** the Debtor;  
 the Chapter 13 Trustee (post-confirmation only);  
 the holder of an unsecured claim (Name: \_\_\_\_\_)  
(post-confirmation modification only).

2. This is a request to modify a Chapter 13 Plan:

A.  post-confirmation;  
B. **X** pre-confirmation;  
i.  Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b));  
ii. **X** Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:

Marine Credit Union

3. The Proponent wishes to modify the Chapter 13 Plan to do the following:

**Clarify payments to Marine Credit Union**

4. The reason(s) for the modification is/are:

To resolve creditors objection to confirmation

5. **B. X** The unconfirmed Chapter 13 Plan, dated March 2, 2016, is modified as follows:

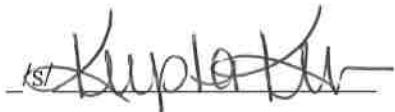
- 1. Debtor shall pay Marine Credit Union's claim, as filed, together with 5.5% interest for the 2003 Ford F-150.**
- 2. The balance of attorney fees shall be paid as follows: All funds available at the initial disbursement after confirmation shall be split between administrative fees and secured creditors; thereafter, the available funds shall be split between the remainder of attorneys fees and secured creditors until attorneys fees are paid in full.**

All remaining terms and provisions of the plan are unaffected unless specifically addressed herein. In the event of a conflict between the original plan and the modification set forth above, the later shall supersede and control.

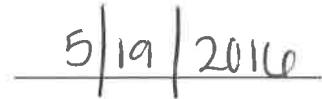
6. **BY SIGNING BELOW THE PROONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

CERTIFICATION

1. I, Krysta L. Kerr, attorney for debtor(s) Rahn Mihelich, certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.



Counsel for the debtor(s)



Date

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Dated: May 19, 2016

Attorneys for

Miller & Miller, LLC.

at City, State.

By:

Krysta L. Kerr

Milwaukee, Wisconsin

Bar No.

1090070

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EASTERN DISTRICT OF WISCONSIN

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Case No.: 2016-21724-GMH-13  
Chapter 13  
CERTIFICATE OF MAILING

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STATE OF WISCONSIN)  
) SS  
MILWAUKEE COUNTY)

Stacey Martinez, being sworn states that on May 19, 2016, mailed properly enclosed in a postpaid envelope, copy of the **Notice and Request to Modify Chapter 13 Plan**, that was filed with the court, to the following named persons at their proper post office address after their respective names:

Darnieder & Geraghty  
Attorney Mark Darnieder  
735 N. Water Street, Suite 930  
Milwaukee, WI 53202

Rahn Mihelich  
125 Lakeside West  
Burlington, WI 53105

Trustee Mary Grossman - via ECF

U.S. Bankruptcy Trustee - via ECF

Subscribed and sworn to before  
me this 19th day of may, 2016.



Krysta L. Kerr  
Notary Public, State of Wisconsin  
My commission is permanent.

/s/

Stacey Martinez  
**MILLER & MILLER LAW, LLC**  
735 W. Wisconsin Avenue, Suite 600  
Milwaukee, WI 53233  
(414) 277-7742